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BEIJING BRUSSELS DUBAI FRANKFURT JOHANNESBURG
LONDON LOS ANGELES NEW YORK SAN FRANCISCO
SEOUL SHANGHAI SILICON VALLEY WASHINGTON

Covington & Burling LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018-1405
T +1 212 841 1000

By ECF

May 19, 2022

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: U.S. v. Donal O'Sullivan et al.
20 cr 272 (PKC)

Dear Judge Chen:

I represent the defendant Donal O'Sullivan in the above-referenced matter. I write, on behalf of all three defendants, to request a modification of the date for sentencing in this case, which have been scheduled for August 2, 2022. We make this request for two reasons.

First, both Chris Flood (counsel for Helen O'Sullivan) and Sean O'Shea (counsel for Padraig Naughton) are scheduled to commence trials on August 1. Mr. Flood's trial is scheduled to last for several weeks; Mr. O'Shea's trial is scheduled to last for several days if not longer. In addition, both will be engaged in trial preparation for several weeks prior to the commencement of their respective trials.

Second, to our knowledge the Probation Department has not yet commenced its pre-sentence investigations in this case. Given that, we do not believe it is realistic that all of the steps necessary to have this case ready for sentencing – including conducting the pre-sentence investigations, preparing a Pre-Sentence Report (“PSR”) for each of the three defendants, submitting and responding to any objections to the PSRs, issuing revised PSRs, and preparing sentencing submissions from each of the parties in this case – can take place by (or reasonably close to) August 2.

Under all these circumstances, we respectfully suggest that the August 2 sentencings be postponed and that the Court schedule a status conference for early September, at which time the parties and the Court will be in a better position to know the status of the Probation Department pre-sentence process and schedule a new date for sentencings.

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I have conferred with the government with respect to this request and have been informed that the government consents to this request.

This is the defendants' first request for the rescheduling of the sentencing in this case.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Alan Vinegrad

Alan Vinegrad

cc (by ECF): All counsel of record